

REMARKS

This communication is in response to the Office Action mailed on December 1, 2004.

The Office Action first reports that claims 1-3 were rejected under 35 U.S.C. 102(b) as being anticipated by Durrani (U.S. Pat. 6,011,542). Durrani discloses a graphical text entry system that includes a graphical text entry wheel that displays characters. A user selects one of the characters on the wheel to be entered. After selection of a character, the graphical text entry system may suggest next characters or words to aid in text entry (see abstract and/or col. 4, l. 50 through col. 5, l. 57). It is important to note that the system of Durrani requires the user to initially select the first character from the graphical text wheel of characters. Subsequent characters are also selected by the user although the graphical text system may reorder the characters on the wheel based on likelihood of being selected as opposed to alphabetical order.

In contrast to the system of Durrani, the present invention recited by amended claim 1, described throughout the application and illustrated in the figures has the computer select the initial character and from the initial character select a word for display. The word is presented to the user and the system awaits an action from the user pertaining to the selected character. In particular, as recited in one of the dependent claims, the method awaits an indication by the user that the character is correct, or that the desired character alphabetically precedes or succeeds the selected character. A detailed description of the this technique is provided at p. 13,

l. 18 through p. 14, l. 2 as well as at p. 16, l. 26 through p. 17, l. 24.

Claim 1 has been amended to clarify this patentable difference. In particular, claim 1 has been amended to recite, "having the computer select a character in a range of characters; and having the computer select a word as a function of the selected character." Again, as indicated above, Durrani does not teach or suggest this method of entry. Rather, Durrani requires the user to initially select the first character for the desired word. Accordingly, applicant respectfully believes claim 1 as amended is allowable. Withdrawal of the rejection is respectfully requested.

Claim 2 recites that, "the step of receiving includes receiving an indication that a desired character is in a range alphabetically preceding or alphabetically succeeding the selected character, wherein steps (a)- (d) are repeated where the range of characters are bound by the selected character. Durrani was cited as disclosing this feature at col. 4, ll. 50-67 and col. 5, ll. 1-22. This description of Durrani however pertains to allowing the user to select other characters (after the initial character has been selected) from the graphical text wheel based on alphabetical listing, or based on the character most likely to next follow the preceding character.

The description does not teach or suggest the method recited by the combination of claims 1 and 2. In particular, claim 2 clearly recites that the indication provided by the user is used to define the range of characters used by the computer in selecting the next character. This is made clear by the phrase, "where the range of characters is bounded by the

selected character." Since claim 2 also recites the steps (a)-(d) are repeated, it is clear that it is from this range that the computer makes the selection of the next character. Again, this is quite different than what is taught or suggested by Durrani since it is the user that selects the characters and not the computer. Claim 2 has been amended to clarify the ranges are alphabetical. Support for this amendment is found at least at page 14, ll. 12-20.

The Office Action next reports that claims 4 and 6-22 were rejected under 35 U.S.C. 103(a) as being unpatentable over Durrani in view of Connolly (U.S. Pat. 6,011,542). Connolly also describes a system for entering text. Like Durrani discussed above, Connolly also first requires the user to select the initial key pertaining to the desired character (col. 2, ll. 25-27). Connolly then presents a predicted character to the user for confirmation (step 350) based on the context of the preceding characters in an N-gram model.

Amended claim 4, which has been amended to depend from claim 2, recites "wherein the step of receiving includes receiving an indication to accept the set of characters wherein steps (a)-(d) are repeated with the set of retained characters comprising an empty set and the range of characters comprising a full range of characters." It is reported that Durrani does not disclose this limitation but Connolly does at col. 3, ll. 23-33. The undersigned fails to see how this description meets the limitations recited in claim 4. The cited description in Connolly appears to explain in further detail the use of the N-gram in selecting the next possible characters where "hell" has already been confirmed. Thus, the set of retained characters is

not an empty set as recited in claim 4, but rather has been confirmed to be "hell". Withdrawal of the rejection is respectfully requested.

Claims 6-14 were also rejected based upon the combination of Durrani and Connolly. Each of these dependent claims recites further features of the patentable method recited by claim 1. Applicant respectfully believes that each claim is separately patentable at least in combination with independent claim 1 and any intervening claims again because neither Durrani or Connolly allows the computer to initially select the character and then the word as recited by claim 1. When claim 1 is combined with further features such as that the user providing indications through the computer to refine the range of the desired character as in claim 8, or selecting the character as a function of probability as in claim 6, or selecting the word as a function of probability as in claim 7, these patentable inventions are not taught or suggested.

Independent claim 15 was rejected based on the combination of Durrani and Connolly. Claim 15 has been amended in a manner similar to claim 1 to emphasize that it is the computer that selects the word as a function of a set of retained characters. The word is presented to the user and an action is received from the user pertaining to "a character in the word following the set of retained characters". (Emphasis added.) It is important to realize that the present invention as recited by claim 15, focuses on the character in the rendered word following the set of retained characters and it is with respect to this character that the method receives an action or indication from the user. Although Durrani may provide a

suggested word or words in a mode of operation, the user is not asked to provide an indication as to the relevance of the next character in the proposed word. In particular, in the present invention, the user provides an indication whether or not the desired character alphabetically precedes, alphabetically succeeds or is the correct character. Neither Durrani or Connolly make this inquiry. Connolly is cited at col. 6, ll. 37-55 for teaching this idea, however, this description does not pertain to a rendered word at all. Accordingly, withdrawal of the rejection is respectfully requested.

Dependent claim 16 has been amended to clarify that the desired character alphabetically proceeds or succeeds the presented word. Connolly is cited at col. 6, ll. 35-41 and col. 4, ll. 32-53 for teaching the elements of claim 16. Connolly allows the user to select a key to indicate the desired character is in a range for example, depressing the "2" for signifying the range "a-c". However, claim 16 further refers to the presented word, which Connolly does not teach or suggest. Accordingly, dependent claim 16 is believed allowable.

Similarly, although claim 17 was rejected based upon Durrani and Connolly, it too depends from claim 15 and claim 16, but also refers to the word presented to the user which is naught taught or suggested by the cited combination.

Independent claim 18 is similar to independent claim 1 but recites a computing device incorporating the method of claim 1. Independent claim 18 was rejected based upon a combination of Durrani and Connolly. For the reasons discussed above with respect to Durrani and Connolly, it is respectfully submitted that this claim is also allowable. In particular, for the

reasons that Durrani and Connolly both require the user to select the initial character, it is respectfully submitted that this combination of references does not teach or suggest the invention of independent claim 18 because claim 18 specifically recites that it is the module that selects the character and from the selected character the module selects the word that is rendered to the user.

In view of the foregoing, reconsideration of the application as amended is respectfully requested. Favorable action upon all claims is solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

WESTMAN, CHAMPLIN & KELLY, P.A.

By: 

Steven M. Koehler, Reg. No. 36,188
Suite 1600 - International Centre
900 Second Avenue South
Minneapolis, Minnesota 55402-3319
Phone: (612) 334-3222 Fax: (612) 334-3312

SMK:jmb:dkm